

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

FILED

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CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

SEALED

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID SCOTT TAYLOR,

Defendant.

CRIMINAL NO.

A11 CR BY 011 LY
INDICTMENT

USAO #2009R14278

[Violations:

18 U.S.C. § 26 U.S.C. § 7206(1)

Willful Subscription to False Documents]

THE GRAND JURY CHARGES:

Introduction

At all relevant times herein,

1. The Defendant,

DAVID SCOTT TAYLOR,

was married. From at least January 1, 2002, to the present, the Defendant maintained a residence in Pflugerville, Texas.

2. From August 14, 2000 to the present, the Defendant worked at Dell Incorporated as a Technical Consultant.

3. For each of the calendar years 2002-2008, Dell Incorporated issued to the Defendant, a *Form W-2, Wage and Tax Statement*. Each *Form W-2, Wage and Tax Statement*, issued to the Defendant, described wages paid to the Defendant by Dell Incorporated in each of the calendar years 2002-2008.

4. The Defendant, received wages from Dell Incorporated for calendar years 2002-2008 totaling approximately \$1,000,104.55.

5. The Internal Revenue Service ("IRS") is an agency of the United States Department of Treasury responsible for enforcing and administering the tax laws of the United States, and collecting taxes owed to the United States.

COUNT ONE
[26 U.S.C. § 7206(1)]

The Grand Jury re-alleges and incorporates the Introduction (numbered paragraphs 1-5) of this Indictment as if fully set forth herein.

On or about the 18th day of April, 2006, in the Western District of Texas, the Defendant,

DAVID SCOTT TAYLOR,

did willfully make and subscribe a false document namely: *a 2002 Form 1040X, Amended U.S. Individual Income Tax Return*, which was verified by a written declaration that it was made under the penalties of perjury and which the Defendant did not believe to be true and correct as to every material matter. The *2002 Form 1040X, Amended U.S. Individual Income Tax Return* was filed with the Internal Revenue Service, reported that the Defendant had adjusted gross income of \$-3,000 on Line 1, and claimed a refund of \$11,047 on Line 23, whereas the Defendant then and there knew and believed he had received income in that calendar year and was not due the refund claimed.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT TWO
[26 U.S.C. § 7206(1)]

The Grand Jury re-alleges and incorporates the Introduction (numbered paragraphs 1-5) of this Indictment as if fully set forth herein.

On or about the 5th day of October, 2006, in the Western District of Texas, the Defendant,

DAVID SCOTT TAYLOR,

did willfully make and subscribe a false document, namely: *a 2003 Form 1040X, Amended U.S. Individual Income Tax Return*, which was verified by a written declaration that it was made under the penalties of perjury and which the Defendant did not believe to be true and correct as to every material matter. The *2003 Form 1040X, Amended U.S. Individual Income Tax Return* was filed with the Internal Revenue Service, reported that the Defendant had adjusted gross income of \$0 on Line 1, and claimed a refund of \$15,064 on Line 23, whereas the Defendant then and there knew and believed he had received income in that calendar year and was not due the refund claimed.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT THREE
[26 U.S.C. § 7206(1)]

The Grand Jury re-alleges and incorporates the Introduction (numbered paragraphs 1-5) of this Indictment as if fully set forth herein.

On or about the 15th day of April, 2005, in the Western District of Texas, the Defendant,

DAVID SCOTT TAYLOR,

did willfully make and subscribe a false document, namely: *a 2004 Form 1040, U.S. Individual Income Tax Return*, which was verified by a written declaration that it was made under the penalties of perjury and which the Defendant did not believe to be true and correct as to every material matter. The *2004 Form 1040, U.S. Individual Income Tax Return* was filed with the Internal Revenue Service, reported that the Defendant, had adjusted gross income of \$0 on Line 37, and claimed a refund of \$25,086 on Line 72(a), which the Defendant received, whereas the Defendant then and there knew and believed had income in that calendar year and was not due the refund claimed.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT FOUR
[26 U.S.C. § 7206(1)]

The Grand Jury re-alleges and incorporates the Introduction (numbered paragraphs 1-5) of this Indictment as if fully set forth herein.

On or about the 15th day of April, 2006, in the Western District of Texas, the Defendant,

DAVID SCOTT TAYLOR,

did willfully make and subscribe a false document, namely: *a 2005 Form 1040, U.S. Individual Income Tax Return*, which was verified by a written declaration that it was made under the penalties of perjury and which the Defendant did not believe to be true and correct as to every material matter. The *2005 Form 1040, U.S. Individual Income Tax Return* was filed with the Internal Revenue Service, reported that the Defendant, had adjusted gross income of \$190 on Line 38, and claimed a refund of \$42,506 on Line 73(a), whereas the Defendant then and there knew and believed he had received income in that calendar year and was not due the refund claimed.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT FIVE
[26 U.S.C. § 7206(1)]

The Grand Jury re-alleges and incorporates the Introduction (numbered paragraphs 1-5) of this Indictment as if fully set forth herein.

On or about the 15th day of April, 2007, in the Western District of Texas, the Defendant,

DAVID SCOTT TAYLOR,

did willfully make and subscribe a false document, namely: *a 2006 Form 1040, U.S. Individual Income Tax Return*, which was verified by a written declaration that it was made under the penalties of perjury and which the Defendant did not believe to be true and correct as to every material matter.

The *2006 Form 1040, U.S. Individual Income Tax Return* was filed with the Internal Revenue Service, reported that the Defendant, had adjusted gross income of \$0 on Line 38, and claimed a refund of \$25,520 on Line 74(a), whereas the Defendant then and there knew and believed he had received income in that calendar year and was not due the refund claimed.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT SIX
[26 U.S.C. § 7206(1)]

The Grand Jury re-alleges and incorporates the Introduction (numbered paragraphs 1-5) of this Indictment as if fully set forth herein.

On or about the 15th day of April, 2008, in the Western District of Texas, the Defendant,

DAVID SCOTT TAYLOR,

did willfully make and subscribe a false document, namely: *a 2007 Form 1040, U.S. Individual Income Tax Return*, which was verified by a written declaration that it was made under the penalties of perjury and which the Defendant did not believe to be true and correct as to every material matter.

The *2007 Form 1040, U.S. Individual Income Tax Return* was filed with the Internal Revenue Service, reported that the Defendant had adjusted gross income of \$0 on Line 38, and claimed a refund of \$27,478.91 on Line 74(a), whereas the Defendant then and there knew and believed he had received income in that calendar year and was not due the refund claimed.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT SEVEN
[26 U.S.C. § 7206(1)]

The Grand Jury re-alleges and incorporates the Introduction (numbered paragraphs 1-5) of this Indictment as if fully set forth herein.

On or about the 15th day of April, 2009, in the Western District of Texas and elsewhere, the Defendant,

DAVID SCOTT TAYLOR,

did willfully make and subscribe a false document, namely: *a 2008 Form 1040, U.S. Individual Income Tax Return*, which was verified by a written declaration that it was made under the penalties of perjury and which the Defendant did not believe to be true and correct as to every material matter. The *2008 Form 1040, U.S. Individual Income Tax Return* was filed with the Internal Revenue Service, reported that the Defendant had adjusted gross income of \$0 on Line 38, and claimed a refund of \$35,596.40 on Line 73(a), whereas the Defendant then and there knew and believed he had received income in that calendar year and was not due the refund claimed.

All in violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL:

**ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002**

JOHN E. MURPHY
UNITED STATES ATTORNEY

By:



Mark Lane
Assistant United States Attorney